

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
(Alexandria Division)**

**VERISIGN, INC.,**

**Plaintiff,**

**v.**

**XYZ.COM, LLC, et al.**

**Defendants.**

**Case No. 1:14-cv-01749-CMH-TRJ**

**JOINT DISCOVERY PLAN**

Plaintiff VeriSign, Inc. (“Verisign”), and Defendants XYZ.COM, LLC and Daniel Negari, by and through undersigned counsel, hereby state as follows for their Joint Discovery Plan submitted pursuant to the Scheduling Order issued March 31, 2015 (Docket No. 24):

**Rule 26(f) Conference**

Counsel for the parties conferred as required by Rule 26(f) on April 1, 2015.

**Initial Disclosures**

The parties shall exchange initial disclosures as required by Rule 26(a)(1) on or before Wednesday, April 15, 2015.

**Discovery**

All discovery shall be completed by Friday, August 14, 2015, and shall be subject to the limitations set forth in the Scheduling Order (Docket No. 24), the Federal Rules of Civil Procedure, and the Local Rules of this Court, subject to either party’s right to seek to propound additional discovery by agreement of the parties or for good cause shown. All written discovery shall be served in time to assure that it is answered before the deadline for the completion of

discovery. The parties agree that discovery should not be conducted in phases or limited in advance to particular issues but shall be subject to the right of either party to object to particular discovery requests in accordance with the applicable rules.

**Expert Witnesses**

The parties agree that the expert disclosures required by Rule 26(a)(2) shall be made as follows:

June 19, 2015: opening expert reports (by whichever party has the burden of proof on the particular issue);

July 17, 2015: rebuttal expert reports (to respond to the opening expert reports):  
July 17, 2015; and

July 31, 2015: reply expert reports (to respond to material raised in the rebuttal expert reports).

**Electronically Stored Information (“ESI”)**

The parties agree to cooperate in the exchange of ESI in a reasonable manner to mitigate the expense of production. Where feasible, ESI shall be exchanged in TIFF or JPG/PDF format, and with readable OCR.

**“Clawback” Agreement**

The parties will operate under Rule 26(b)(5)(B).

**Trial By Magistrate Judge**

The parties do not consent to trial before a Magistrate Judge.

**Settlement**

The parties have discussed their claims and defenses and the possibility of settlement with their respective counsel.

**Summary Judgment**

The parties agree that Rule 56 and Local Rule 56 shall govern motions for summary judgment.

**Protective Order**

The parties agree in good faith to negotiate a protective order to preserve the confidentiality of commercially sensitive documents and information.

Dated: April 1, 2015

/s/  
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*Counsel to Defendants XYZ.COM, LLC and  
Daniel Negari*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 1st day of April, 2015, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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/s/  
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